

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SAMAD BROTHERS, INC.,

Plaintiff,

v.

BOKARA RUG CO. INC., JAN SOLEIMANI,
and GABRIEL VAKNIN,

Defendants.

Case No.: 09-cv-5843 (JFK)(KNF)

**SECOND DECLARATION OF
JURA C. ZIBAS IN SUPPORT OF
DEFENDANT'S OBJECTION TO
ORDER OF MAGISTRATE JUDGE
DATED FEBRUARY 10, 2010**

I, Jura C. Zibas, do declare and say:

1. I am an attorney at Wilson Elser Moskowitz Edelman & Dicker, LLP, counsel to defendants Bokara Rug Co. Inc., Jan Soleimani and Gabriel Vaknin (collectively "Bokara"). I make this declaration from personal knowledge and based on a review of the files of this case.

2. Attached hereto as **Exhibit 1** is a true and correct copy a letter sent to Mag. Judge Fox on behalf of Bokara, dated November 4, 2010.

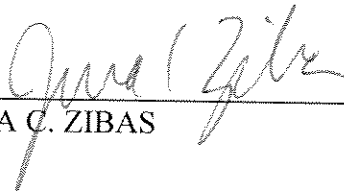
3. Attached hereto as **Exhibit 2** is a true and correct copy a letter sent to Mag. Judge Fox on behalf of Bokara, dated December 6, 2010.

4. Attached hereto as **Exhibit 3** are true and correct excerpts from the transcript of the January 24, 2011 telephone conference held before Mag. Judge Fox.

5. Attached hereto as **Exhibit 4** are true and correct excerpts from the transcript of the November 16, 2010 telephone conference held before Mag. Judge Fox.

I hereby declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief. If called to testify on these topics, I could do so competently.

Dated: March 16, 2011
New York, New York



JURA C. ZIBAS